

CRAIG K. PERRY & ASSOCIATES

Craig K. Perry (Nevada Bar No. 3786)
6210 N. Jones Boulevard, #753907
Las Vegas, Nevada 89136
Email: attorneycperry@gmail.com
Telephone: (702) 893-4777

SMITH KRIVOSHEY, PC

Yeremey O. Krivoshey (*pro hac vice*)
166 Geary Street, Ste. 1500-1507
San Francisco, CA 94108
E-Mail: yeremey@skclassactions.com
Phone: 415-839-7000

SMITH KRIVOSHEY, PC

Aleksandr “Sasha” Litvinov (*pro hac vice*)
867 Boylston Street, 5th Floor, Ste. 1520
Boston, MA 02116
E-Mail: sasha@skclassactions.com
Phone: 617-377-7404

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ERIN ROBERTSON, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

VIVINT SMART HOME, INC., a Delaware
corporation,

Defendant.

Case No. 2:24-cv-01572-JAD-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO FILE HER FIRST AMENDED
COMPLAINT IN RESPONSE TO
DEFENDANT’S MOTIONS TO STRIKE
AND DISMISS, AND TO SET BRIEFING
SCHEDULE**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff, Erin Robertson, on behalf of herself and others similarly situated, and Defendant, Vivint Smart Home, Inc., and pending the Court’s approval, that Plaintiff shall have an additional twenty-one (21) days

1 to file her First Amended Complaint in response to Defendant's Motion to Dismiss (ECF No. 17)
2 and Motion to Strike (ECF No. 18) filed in this matter. Plaintiff's current response deadline
3 is October 24, 2024. With the requested twenty-one day extension, Plaintiff's deadline to file
4 her First Amended Complaint is extended to November 14, 2024.

5 Good cause exists for the extension and briefing schedule set forth herein. The parties and
6 their counsel have been and are continuing to informally exchange information. Recently,
7 the parties discovered new facts that impact the basis of the claims and defenses in this case and
8 are analyzing the issues presented by this new information. The parties request an additional
9 twenty-one (21) days to assess these new facts and discuss their respective positions. This request
10 is made in good faith and is not intended for purposes of delay.

11 It is further stipulated and agreed that Defendant shall have thirty (30) days to respond to
12 Plaintiff's First Amended Complaint, or by and through December 16, 2024. If Defendant files a
13 motion to dismiss and/or motion to strike in lieu of an Answer, Plaintiff shall have thirty (30)
14 days to oppose such motion(s), or by and through January 15, 2025. Defendant shall have
15 twenty-one (21) days to file its reply, or by and through February 5, 2025.

16 Respectfully submitted this 23rd day of October, 2024.
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/s/ Jonathan W. Fountain (w/ permission)

L. Christopher Rose, Esq.
Nevada Bar No. 7500
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
HOWARD & HOWARD ATTORNEYS,
PLLC
3800 Howard Hughes Pkwy, Suite 1000
Las Vegas, NV 89169
Tel. (702) 257-1483
Email : lcr@h2law.com
Email: jwf@h2law.com

Michael D. Matthews, Jr.
Netra Sreeprakash, Esq.
Admission pro hac vice pending
McDOWELL HETHERINGTON LLP
1001 Fannin Street, Suite 2400
Houston, TX 77002
Tel. (713) 221-9841
Email: netra.sreeprakash@mhllp.com

*Attorneys for Defendant,
Vivint Smart Home, Inc.*

/s/ Aleksandr "Sasha" Litvinov

Aleksandr "Sasha" Litvinov (SBN 95598)
(Appearing Pro Hac Vice)
SMITH KRIVOSHEY, PC
867 Boylston Street 5th Floor #1520
Boston, MA 02116
Telephone: 617-377-7404
Facsimile: (888) 410-0415
E-Mail: sasha@skclassactions.com

Yeremey O. Krivoshey (SBN 295032)
(Appearing Pro Hac Vice)
SMITH KRIVOSHEY, PC
166 Geary Str STE 1500-1507
San Francisco, CA 94108
Telephone: 415-839-7077
Facsimile: (888) 410-0415
E-Mail: yeremey@skclassactions.com

Craig K. Perry
Nevada Bar No. 3786
CRAIG K. PERRY & ASSOCIATES
6210 N. Jones Boulevard, #753907
Las Vegas, Nevada 89136
Telephone: (702) 893-4777
Email: attorneycperry@gmail.com

*Attorneys for Plaintiff,
and the Proposed Classes*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 10/28/2024